

# Exhibit

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**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MARYLAND**

SABEIN BURGESS,

\*

Plaintiff,

\*

Case No. 1:15-cv-00834

v.

\*

Judge Bennett

BALTIMORE POLICE DEPARTMENT,  
*et al.*,

\*

JURY TRIAL DEMANDED

\*

Defendants.

\* \* \* \* \*

**PLAINTIFF'S SECOND SUPPLEMENTAL RULE 26(a)(2) DISCLOSURE**

Plaintiff SABIEN BURGESS, by his attorneys LOEVY & LOEVY, pursuant to Federal Rule of Civil Procedure 26(a)(2) and Local Rule 104(10), makes the following second supplemental disclosure:

**ADDITIONAL WITNESS DESIGNATED UNDER RULE 26(a)(2)(B)**

1. **Wayne Niemeyer** may be called as a retained expert to present evidence at trial under Federal Rules of Evidence 702, 703, or 705, consistent with the signed report attached to this disclosure. His qualifications, list of publications, rate of compensation, and past testimony have been provided previously.

The foregoing disclosures are based on information and documents available to all parties in this case. Plaintiff and the above expert expressly reserve their rights to supplement and amend these disclosures as discovery proceeds.

RESPECTFULLY SUBMITTED,

/s/ Steven Art

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**CERTIFICATE OF SERVICE**

I, Steven Art, an attorney, hereby certify that on August 17, 2017, I served the foregoing PLAINTIFF'S SECOND SUPPLEMENTAL RULE 26(a)(2) DISCLOSURE on all counsel of record via electronic mail.

/s/ Steven Art

Steven Art  
*One of Plaintiff's Attorneys*